

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

FILED
CLERK'S OFFICE

LITCHFIELD FINANCIAL
CORPORATION,
TEXTRON FINANCIAL
CORPORATION,
LAND FINANCE COMPANY,
Plaintiffs,

v.

BUYERS SOURCE REAL ESTATE
GROUP, BUYERS SOURCE VALLEY
GROUP, LLC,
BUYERS SOURCE SUGARMILL, LLC,
BUYERS SOURCE, SAVANNAH
LAKES, LLC, THOMAS H. BREWER,
FREDERICK D. BLAKE, BETTY M.
BREWER, SUSAN GARD, HENRY
MONTGOMERY, LANNIE CAMPBELL,
RONALD P. FERGUSON, STEPHEN A.
HUDGINS, ESQUIRE, STEPHEN A.
HUDGINS, PC, HUDGINS &
STALLINGS, PC, J. VANCE
STALLINGS, ESQUIRE, JOHN C.
LUMPKIN, ESQUIRE,
JOHN C. LUMPKIN, PC, WILLIAM
GREGORY SEIGLER, ESQUIRE,
Defendants.

U.S. DISTRICT COURT
WESTERN DIVISION
CIVIL ACTION NO. 04-CV-30076 KPN

FILING FEE PAID:
RECEIPT # 305724
AMOUNT \$ 50.00
BY DPTY CLK 114
DATE 9/7/04

**MOTION PURSUANT TO LOCAL RULE 83.5.3 FOR
ADMISSION TO PRACTICE PRO HAC VICE**

NOW COMES, George R. Moore, a member in good standing of the Bar of the Commonwealth of Massachusetts, an attorney admitted to practice before the United States District Court for the District of Massachusetts, and a partner in the firm of Devine, Millimet & Branch, Professional Association, and hereby moves the Court to enter an order permitting Attorney Charles M. Lollar to practice *pro hac vice* before the United States District Court for the District of Massachusetts to represent the Defendants,

John C. Lumpkin, Esquire, John C. Lumpkin, P.C., Stephen A. Hudgins, Esquire, Stephen A. Hudgins, P.C., and Hudgins & Stallings, P.C., pursuant to Local Rule 83.5.3.

In support of this motion, movant states as follows:

1. Charles M. Lollar is a member in good standing of the Bar of the State of Virginia, and was admitted to practice before all courts in Virginia since 1977, including the United States District Court for the District of Virginia. Charles M. Lollar is also a member in good standing of the Bar of the State of North Carolina and was admitted to practice before all courts in North Carolina since 1977, including the United States District Court for the District of North Carolina. There are no disciplinary proceedings pending against Charles M. Lollar in any jurisdiction.

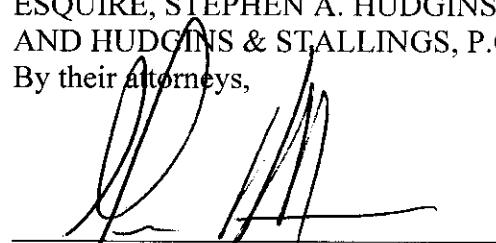
2. In support of the relief requested in this motion, attached hereto as Exhibit A is Charles M. Lollar's Affidavit in Support of Admission as Counsel *Pro Hac Vice*.

3. Movant requests that this Court approve this motion so that Charles M. Lollar may file pleadings and appear and be heard at hearings in this case.

4. No previous request for the relief sought herein has been made in this matter to this or any other Court.

WHEREFORE, movant respectfully requests that this Court enter an Order permitting Charles M. Lollar to appear *pro hac vice* for the purpose of representing the Defendants, John C. Lumpkin, Esquire, John C. Lumpkin, P.C., Stephen A. Hudgins, Esquire, Stephen A. Hudgins, P.C., and Hudgins & Stallings, P.C., in connection with all aspects of the above-captioned action.

DEFENDANTS,
JOHN C. LUMPKIN, ESQUIRE, JOHN C.
LUMPKIN, P.C., STEPHEN A. HUDGINS,
ESQUIRE, STEPHEN A. HUDGINS, P.C.,
AND HUDGINS & STALLINGS, P.C.,
By their attorneys,



George R. Moore, BBO #656102
DEVINE, MILLIMET & BRANCH, PA
300 Brickstone Square, 9th Floor
P.O. Box 39
Andover, MA 01810
(978) 475-9100

Certificate Of Service

I hereby certify that a copy of the foregoing has this **30th** day of **August, 2004** been forwarded by U.S. First Class Mail to:

Counsel for Plaintiffs:
Jeffrey L. McCormick, Esquire
Robinson Donovan, PC
1500 Main Street
PO Box 15609
Springfield, MA 01115
Tel: 413-732-2301

Counsel for William Gregory Seigler,
Esquire:
Peter M. Durney, Esquire
Cornell & Gollub
75 Federal Street
Boston, MA 02110
Tel: 617-482-8100

Pro Hac Vice Counsel for William Gregory
Seigler, Esquire:
Samuel Outten, Esquire
Womble, Carlyle, Sandridge & Rice
Poinsett Plaza, Suite 700
104 South Main Street
Post Office Box 10208
Greenville, SC 29603-0208
Tel: 864-255-5400